

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: Maribel Lopez Noriega Debtor,	§ § § § § §	Case No. 19-41171 Chapter 13
---	----------------------------	---

**RESPONSE OF U.S. BANK N.A. AS TRUSTEE
OF THE BUNGALOW SERIES III TRUST
TO OBJECTION TO PROOF OF CLAIM #10 FILED BY TRUSTEE
(Objection to Proof of Claim Doc# 33)**

COMES NOW, U.S. Bank Trust National Association, as Trustee of the Bungalow Series III Trust (“Creditor”) and files its response to Trustee’s Objection to Proof of Claim #10 of U.S. Bank (“Trustee’s Objection”), and in support thereof states as follows:

1. **As to Paragraph 1 of Trustee’s Objection.**

Creditor agrees with the allegations of Paragraph 1.

2. **As to Paragraph 2 of the Trustee’s Objection (*Proof of Claim*).**

Creditor agrees with the allegations of Paragraph 2 of Trustee’s Objection. Creditor is in the process of preparing its amended Proof of Claim.

3. **As to Paragraph 3 of the Trustee’s Objection (*Proof of Claim*).**

Creditor agrees with the allegations of Paragraph 3 of Trustee’s Objection and requests that the Court allow Creditor to amend its Proof of Claim.

WHEREFORE, Creditor requests that the Court allow the amending of Creditor’s Proof of Claim #10.

Respectfully submitted,

ANDERSON VELA, L.L.P.

/S/ Richard E. Anderson

Richard E. Anderson

State Bar No. 01209010

4920 Westport Drive

The Colony, Texas 75056

Telephone: (214) 295-6423

Facsimile: (214) 276 1545

RAnderson@Andersonvela.com

COUNSEL FOR CREDITOR

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Trustee's Objection was served on the 2nd day of July, 2019. Said Response was filed electronically. Service was accomplished by the method and to the following as indicated.

By: /s/ Richard Anderson
RICHARD E. ANDERSON
State Bar No. 01209010
4920 Westport Drive
The Colony, Texas 75056
Email: randerson@AndersonVela.com

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

DEBTOR
Maribel Lopez Noriega
2620 Rolling Meadow (Property)
Carrollton, TX 75010

DEBTOR'S ATTORNEY
Marcus B. Leinart
Leinart Law Firm
11520 N. Central Expressway, Suite 212
Dallas, TX 75243

TRUSTEE
Pam Bassel
7001 Blvd 26, Suite 150
North Richland Hills, TX 76180

U.S. TRUSTEE
United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75202

CREDITOR ATTORNEY

Jared T.S. Pace
Condon Tobin Sladek
Thornton PLLC
8080 Park Lane
Suite 700
Dallas, TX 75231
2142653855
2146916311 (fax)
jpace@ctstlaw.com
Assigned: 03/29/2019

representing

Wilmington Savings Fund Society, FSB d/b/a
Christiana Trust as Owner Trustee of the Residential
Credit Opportunities Trust III
Condon Tobin Sladek Thornton PLLC
8080 Park Lane
Suite 700
Dallas, TX 75231
214-265-3800
214-691-6311 (fax)
jpace@ctstlaw.com
(Creditor)

Melissa Linell Palo
Linebarger Goggan Blair &
Sampson, LLP
2777 N. Stemmons Frwy
Ste 1000
Dallas, TX 75207
(214) 880-0089
(469) 221-5003 (fax)
melissa.palo@lgbs.com
Assigned: 04/12/2019

representing

City of Carrollton
Linebarger Goggan Blair & Sampson, LLP
c/o Melissa L. Palo
2777 N Stemmons Frwy, Suite 1000
Dallas, TX 75207
214-880-0089
469-221-5003 (fax)
dallas.bankruptcy@lgbs.com
(Creditor)

Lewisville ISD
Linebarger Goggan Blair & Sampson, LLP
c/o Melissa L. Palo
2777 N. Stemmons Frwy
Suite 1000
Dallas, TX 75207
214-880-0089
469-221-5003 (fax)
dallas.bankruptcy@lgbs.com
(Creditor)

/s/ Richard E. Anderson
RICHARD E. ANDERSON